



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 27, 2022

By ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Zukeila Plaza, et al.*, S1 22 CR 142 (VSB)

Dear Judge Broderick,

With the consent of the defendants, the Government respectfully writes on behalf of the parties to request an adjournment of approximately sixty days of the conference scheduled for September 29, 2022 at 12:00 PM to a date and time that is convenient for the Court. With the requested adjournment, the Government anticipates completing the provision of discovery, which the defendants in turn anticipate having a meaningful opportunity to review, therefore positioning the parties at the eventual conference to propose respectfully and upon a well-informed basis a schedule for any subsequent pre-trial proceedings, beginning with the filing of any motions from the defendants. In addition, the undersigned representative of the Government was unexpectedly and suddenly taken away from the metropolitan area earlier this month to care for a family member under ongoing circumstances that have not permitted the transfer of responsibility for the case in the ordinary course, which the Government will accomplish before any possible adjournment date should the undersigned representative of the Government remain unavailable. Finally, with the further consent of the defendants, the Government respectfully requests that the Court exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7) from September 29, 2022 through the date of any adjournment on the basis that the interests of the public and the defendants in a speedy trial are outweighed here by the interests of the defendants in having a full opportunity to both receive and review discovery together with their counsel and, in light of that discovery, consider the availability of any pre-trial motions and the possibility of any pre-trial dispositions.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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cc: All Counsel (by ECF)